

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

---

MOHAMED ELLAISY,	)	
	)	
Plaintiff,	)	
	)	No. 13-cv-05401
-vs-	)	
	)	Dist. Ct. Judge Noel L. Hillman
STERLING WHEATEN, BRIAN	)	
HAMBRECHT, MATTHEW ROGERS,	)	Magistrate Judge
JUANITA HARRIS, CITY OF ATLANTIC	)	Zahid N. Quraishi
CITY, JOHN APPLGATE, MICHAEL	)	
ATKINSON, MICHAEL ORDONEZ,	)	
BORGATA HOTEL AND CASINO; AND	)	
UNKNOWN BORGATA PERSONNEL.	)	
	)	
Defendants.	)	

---

**PROPOSED ORDER**

**THIS MATTER** having come before the Court upon the Motion of Plaintiff Mohamed Ellaisy (“Plaintiff”), by and through his counsel, Bonjean Law Group, PLLC, and the Court having considered the facts as set forth in Plaintiff’s Letter Brief in Support of Plaintiff’s Motion for Sanctions and supporting declaration, and good cause having been shown for the relief specified herein.

**IT IS**, on this \_\_\_\_ day of \_\_\_\_\_, 2021; **ORDERED** and **ADJUDGED** that Plaintiff’s Motion for Sanctions requesting the following:

1. Defendant City of Atlantic City must immediately respond to Plaintiff’s Rule 34 Requests for Production is hereby **GRANTED**;
2. Defendant City of Atlantic City waived all objections to Plaintiff’s Request for Production is hereby **GRANTED**;

3. Defendant City of Atlantic City must pay Plaintiff's counsels' reasonable expenses and attorney's fees is hereby **GRANTED**;
4. Defendant City of Atlantic City be held in contempt of court is hereby **GRANTED**

---

Zahid N. Quraishi, U.S.M.J.